

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

NATALIE DAWN BINGHAM, M.D., M.P.H., <i>et al.</i>)	
)	
)	CASE NO. _____
<i>Plaintiffs,</i>)	
)	
v.)	
)	
ALAN McCRORY WILSON, in his official capacity as Attorney General of South Carolina, <i>et al.</i> ,)	
)	
<i>Defendants.</i>)	

PLAINTIFFS' RESPONSES TO LOCAL RULE 26.01
INTERROGATORIES

Plaintiffs, by and through their undersigned counsel, answer the Local Rule 26.01 Interrogatories of the Court as follows:

Interrogatory A: State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

Answer: None known to Plaintiffs.

Interrogatory B: As to each claim, state whether it should be tried jury or nonjury and why.

Answer: Each claim in the Complaint presents a constitutional issue, which is appropriately decided by the Court and not by jury.

Interrogatory C: State whether the party submitting these responses is a publicly-owned company and separately identify (1) any parent corporation and any publicly-held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly-owned company of which

it is a parent; and (3) each publicly-owned company in which the party owns ten percent (10%) or more of the outstanding shares.

Answer: Plaintiffs are not publicly owned companies.

Interrogatory D: State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). *See* Local Civ. Rule 3.01 (D.S.C.).

Answer D: Venue is proper in this district pursuant to 28 U.S.C. § 1391(b)(1) and Local Civ. Rule 3.01(A)(1) (D.S.C.) because Defendant Scarlett Wilson, who is a government officer sued in her official capacity, performs her official duties in this district, and all defendants are residents of South Carolina. Venue is also proper pursuant to 28 U.S.C. § 1391(b)(2) and Local Civ. Rule 3.01(A)(1) (D.S.C.) because a substantial part of the events and omissions giving rise to Plaintiffs' claims occurred in this district.

Interrogatory E: Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the clerk of court based on a determination of whether the cases arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

Answer: Plaintiffs are unaware of any related matters in this District.

Interrogatory F [*Defendants only*]: If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

Answer: N/A.

Interrogatory G: [*Defendants only*.] If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

Answer: N/A.

Interrogatory H: Parties or Intervenor in a Diversity Case. In an action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a), a party or intervenor must, unless the court orders otherwise, name – and identify the citizenship of – every individual or entity whose citizenship is attributed to that party or intervenor. This response must be supplemented when any later event occurs that could affect the court’s jurisdiction under § 1332(a).

Answer: N/A.

[Signature Page Follows]

January 8, 2025
Columbia, South Carolina

Respectfully submitted by:

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